

BNL Groundwater Protection Group
Responses to NYSDEC October 26, 2021 Comments on the June 1, 2021 Five-Year Review Report

Comment Number	Section/ Page	Comment	Response
NYSDEC Letter from B. Jankauskas to R. Gordon, dated October 26, 2021.			
The New York State Department of Environmental Conservation and New York State Department of Health (Departments) have reviewed the Brookhaven National Laboratory (BNL) responses to comments on the 5-Year Review Report. The responses are acceptable except the response to Comment 4, which requires further discussion.			
1	NA	<p>Comment 4 was directed at the current private well monitoring program and the expanded private well sampling event that covered the area defined by Suffolk County Department of Health Services (SCDHS), which includes some new private wells within the private well hook-up area that are not part of the current monitoring program. The 5 Year Review Report clearly identified the private wells within the monitoring program on page 11. The subsequent discussions regarding private well sampling within the 5 Year Review Report can be seen as misleading since it discusses remaining known homeowners still using private wells in the hook-up area or BNL continue to offer homeowners not connected to public water free annual testing, which suggests that the newly identified private wells within the hook-up area are included in the monitoring program. The BNL response indicated that future sampling events will be focused to the initial set of private wells that declined hook-up to public water. This response clearly identifies the private wells in the monitoring program, but please make sure that future reports clearly present the private wells being discussed to eliminate any confusion.</p> <p>The BNL response goes on to provide a general assessment of the new private wells that were sampled within the hook-up area but does not provide any assessment for the private wells located outside the hook-up area.</p>	<p>Future Five Year Reviews will include a general discussion of those properties still on private wells that declined DOE's original public water hook-up offer in 1996 to 1998 and are included in the routine free annual testing program as identified in the OU III ROD. Any potential additional non-routine private well testing performed within the public water hook-up area during future Five Year Review data review timeframes will also be summarized for clarity.</p> <p>As you are aware, the four newly identified properties by NYSDEC and SCDHS (18, 19, 20, and 32) were included as part of the Suffolk County and BSA Technical Services Agreement (TSA) private well testing program (May 1, 2019 through August 14, 2020). Of these four properties, only one property owner agreed to have their private</p>

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		<p>BNL's response to Comment 4 indicated that only the initial set of private wells that declined hook-up to public water will be part of the routine monitoring program.</p> <p>The Departments are requesting BNL to reconsider this response and include four newly identified private wells, identified as 18, 19,20, and 32, as part of the annual sampling program. The four private wells are within the defined hook-up area and located along North Street, which is just south of the site. One of the private wells was recently sampled by SCDHS, but the other three were not. On October 20,2000, SCDHS provided a comment on the Operable Unit III Draft Comprehensive Remedial Design Work Plan that pertained to the potential future need for sampling private wells along North Street as SCDHS will not be in a position to prevent development of these lots or require the hook-up to public water if no water mains are available. On April 24, 2001, BNL response recognized this possibility and agreed that future private well monitoring by BNL would be necessary along North Street. The Departments are requesting BNL to follow through with this commitment.</p>	<p>well sampled by SCDHS (18). PFAS and 1,4-dioxane were not detected in the sample. The other three properties were not sampled by SCDHS during the TSA despite multiple attempts to reach out to the property owners and as a result, the presence of private supply wells at these properties or whether the property owners declined the offer has not been verified. As a result, BSA and DOE believe the intent of the 2001 response to comments in the OU III RD Work Plan has been met and have no intention of adding these or any other properties in the hookup area to the routine annual testing program.</p>
2	NA	<p>SCDHS installed ten vertical profile points to evaluate groundwater conditions down-gradient of BNL and off-site remedial recharge areas and also within supply well capture zones. The vertical profile points were initially installed to evaluate 1,4 dioxane impacts from the site, which SCDHS intended to perform the analysis at their laboratory. Prior to sampling the vertical profile points, PFAS contamination from BNL operations was identified within the environment. SCDHS has indicated that they would like to include PFAS as part of the vertical profiles as minimal effort would be needed to obtain the samples. Unfortunately, SCDHS requires support to analyze samples for PFAS. SCDHS and BNL have worked together in the</p>	<p>BNL has considered the request and agrees to support the SCDHS investigation by funding the PFAS laboratory analysis for three of the five vertical profile locations identified (1, 3 and 5). Based on the data obtained during previous characterization efforts performed by BNL and the location of these three vertical profiles, we believe the data would be beneficial to the planned OU VIII Remedial Investigation work. A brief scope</p>

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		<p>past to obtain information regarding site impacts at private wells. This would appear to be another situation where information can be obtained quickly to help understand site conditions and potential impacts from BNL at a limited cost to BNL. The Departments request that BNL consider supporting SCDHS investigation by funding the PFAS laboratory analysis for a minimum of five of these locations as this information can be helpful for developing the Remedial Investigation Work Plan for Operable Unit VIII. The locations of five priority vertical profile points are identified as 1 through 5 on the enclosed figure. The Departments also feel this will be appreciated by the general public and Community Advisory Council as field work for Operable Unit VIII is anticipated to take significant time as the draft work plan has not been prepared.</p>	<p>of work for this collaborative effort will be required prior to BNL formal approval.</p>
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